

**RATIONALE FOR PROPOSED CHANGES TO REVISION 7 OF
THE QUALITY ASSURANCE PLAN**

Rev. 7 PAGE	Rev. 7 LINE(S)	PROPOSED CHANGE	JUSTIFICATION		*AFFECTS AB	
			Continues to meet 10 CFR 830.120	Rationale	YES	NO
Global		<i>Changed references from CHG to BNI throughout document.</i>	Contractor reference does not affect requirement	Change in reference reflects current contractor		X
Global		<i>Title change revisions:</i> <i>From Senior Vice Presidents to Project Manager</i> <i>From Senior Vice President (TWTO) to Project Manager</i> <i>Deleted Senior Vice President (TWTID)</i> <i>From WTP QA Director to WTP QA Manager</i> <i>From Engineering Vice President to Engineering Manager or Operations Manager</i> <i>From Design Manager to The Engineering Manager or Deputy Project Manager (unless indicated to delete section)</i> <i>From Environmental, Safety, and Health Director to Environmental, Safety, and Health Manager</i> <i>From ES&H Director to ES&H Manager</i> <i>From Projects Controls Director to Business/Project Controls Manager</i> <i>From Administration Manager to Business/Project Controls Manager (unless indicated to delete section)</i> <i>From Operations Director to Operations Manager</i>	Change in organization titles do not affect requirement	Change in title reflects current contractor organizational structure		X
Title Page	Contract #	<i>Contract Number changed to read: DE-AC27-01RV14136</i>	Contract No. does not affect requirement	Reflect current contract number		X
Title Page	All	<i>Revised Authors, Principal Author's and checker's names.</i>	Author identity does not affect requirement	Reflect current author(s)		X
History Sheet	All	<i>Revised for this issue to add reason for Rev 7a.</i>	History does not affect requirement	Provides a chronological listing of changes and the reason for each revision. Required by QARD.		X
Table of Contents	All	<i>Revised to reflect change in page numbers and text.</i>				X
vii Acronyms and Abbreviations	All	<i>Added: BNI Bechtel National Inc.</i> <i>ITS Important to Safety</i> <i>PDC Project Document Control</i> <i>Deleted CHG from list.</i> <i>Deleted QAPIP from list.</i> <i>Deleted "TWTID, TWTO," from the description for "Project".</i> <i>Deleted "TWTID" from list.</i> <i>Deleted "TWTO" from list.</i>	Deletion of CHG and the adding of BNI do not affect requirement	Reflects change in contractor		X

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viii Introduction		<p><i>Deleted text and replaced with the following:</i></p> <p>The U.S. Department of Energy, Office of River Protection (DOE) has contracted Bechtel National, Inc. (BNI) to manage the workscope under the contract DE-AC27-01-RV14136, for the completion of design, performance of construction, and commissioning of the Hanford Waste Treatment and Immobilization Plant (WTP).</p> <p>The WTP is comprised of four major elements, pretreatment, Low-Activity Waste (LAW) immobilization, High-Level Waste (HLW) immobilization, and balance of facilities.</p> <p>To accomplish this mission and to ensure stakeholders expectations of product quality, BNI has developed this Quality Assurance Program. This program will govern all work performed at the WTP, including work performed by BNI WTP subcontractors.</p> <p>The Quality Assurance Program is supported by the Quality Assurance Manual, and procedures, instructions, and guidance documents that implement the program.</p>	Changes do not affect requirements	Introduction does not implement any requirement		X
ix Project Quality Policy		<p><i>Deleted text and replaced with the following:</i></p> <p>The fundamental aspect of any Quality Assurance (QA) Program is that the individuals performing the work determine the level of quality and are responsible for it being achieved. Though plans, procedures, and instructions are a basic part of any quality program, it should be recognized that people make quality happen. Each individual is responsible for the quality of his/her own work.</p> <p>It is the policy of Bechtel National, Inc. to design, construct, commission, maintain and operate the Waste Treatment and Immobilization Plant (WTP) in such a manner as to ensure the health and safety of the public and the personnel onsite and to protect the environment. One way to accomplish this critical objective is to have an aggressive and comprehensive quality assurance program in place, especially for those activities which can impact safety and quality.</p> <p>As the Project Manager, I have directed the establishment of a formal and comprehensive quality assurance program at the WTP. This program places responsibility and accountability for quality on every person for the WTP. In addition, it emphasizes the creation of an atmosphere in the workplace where reporting and resolution of conditions adverse to quality is encouraged and expected at all levels.</p> <p>The Quality Assurance Program is supported by the associated procedures and instructions which implement the Program requirements. The QA Program identifies those Quality Assurance Standards and Codes that shall be implemented to satisfy the contractual requirements.</p>				

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ix Project Quality Policy (cont'd)		<p>Quality assurance objectives shall not be subordinate to cost or schedule objectives. To ensure compliance with the QA Program requirements, independent verifications and assessments shall be conducted to provide management a measure of the program's effectiveness and adequacy in meeting the requirements of the QA Program and its supporting procedures and instructions.</p> <p>Conflicts involving implementation of the requirements of the Quality Assurance Program shall be resolved by the Quality Assurance Manager or, if deemed necessary, the BNI Corporate QA Manager. In those instances when Bechtel has delegated responsibility for implementation of parts of the Quality Assurance Program to suppliers and/or subcontractors, Bechtel retains responsibility for adequacy of the overall program.</p> <p>_____ R. Naventi Project Manager</p>	Quality Policy statement change does not affect requirement	The BNI Quality Policy statement is equivalent to the CHG Quality Policy statement		X
1 Quality Program 1.1 Objective		<p><i>2nd paragraph, deleted the 3rd sentence:</i></p> <p>In addition, a Quality Assurance Program Description is developed to incorporate the identified QA requirements and to provide a description of management systems application.</p>	The QA Program Description document reiterated the QAP and has been cancelled	No affect on requirements, they continue to be covered by the QAP or the QA Provisions Document		X
1.2 Purpose and Scope		<p><i>2nd paragraph, changed to read as follows:</i></p> <p>The QAP reflects the quality requirements of 10 <i>Code of Federal Regulations</i> (CFR) Part 830.120, <i>Top-Level Radiological, Nuclear, and Process Safety Standards and Principles for Tank Waste Remediation (TWRS) Privatization Contractors</i> (DOE-RL 96-0006), <i>Guidance for Review of TWRS Privatization Contractor Quality Assurance Program</i>, RL/REG-96-01, RPP-WTP quality policies, and defines their applicability to project work.</p> <p><i>5th paragraph, 2nd sentence, changed is to are.</i></p> <p><i>5th paragraph, 3rd sentence, changed are to is</i></p>	Title correction does not affect requirement	Change made in response to customer comment		X
1.3 Requirements and Structure		<p><i>2nd paragraph, 2nd bullet, changed "Process" to "Program".</i></p>	Document title correction does not affect requirement	Change made to correct title		X
Table 1-1		<p><i>Table title, deleted text " , Rev 5b".</i></p> <p><i>3rd line in Table, 2nd column, changed to read as follows:</i></p> <p>Sections 1 and 2</p>	Change does not affect requirement	Clarifies and corrects table information		X
1.3.1 Classification of Items		<p><i>1st paragraph, 1st sentence, added acronym "(ITS)" after "Important to Safety".</i></p> <p><i>In the 2nd to the last paragraph in the section, 1st sentence, delete "TWRS-P".</i></p>	Change does not affect requirement	Change made to clarify the term "ITS"		X
1.3.5 Organization		<p><i>1st paragraph, first sentence, changed "are" to "is".</i></p>	Change does not affect requirement	Grammar change		X

* Affect means to diminish or reduce the scope of the Authorization Basis

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1.6 Program Reviews		<i>1st paragraph, 1st sentence, changed to read:</i> The Project Manager and the WTP QA Manager shall perform an annual review of the Project QAP, project quality policies, and implementing project procedures for conformance with applicable regulatory and quality requirements.	Change does not affect requirement	Clarifies the assignment of responsibility for this requirement		X
2 Personnel and Qualification 2.3 Responsibilities		<i>“All Managers” section, first line of text, changed to read:</i> Are responsible for: <i>“The Project Manager” section, first line of text, changed to read:</i> Is responsible for: <i>Delete title and section “The Senior Vice President (TWTID)”.</i> <i>Delete title and section “The Design Manager”.</i>	Does not affect requirement	Change reflects new title and assignment of existing responsibilities		X
3 Quality Improvement 3.2 Requirements 3.2.1 Control of Nonconforming Items, Services, and Processes		<i>6th paragraph, 3rd sentence, changed to read:</i> The follow-up verification of the effectiveness of corrective actions is performed by WTP QA Manager through inspection, surveillance, assessment, and audit. <i>7th paragraph, 5th sentence, revised to read:</i> The meeting is part of the Project Management Monthly Status Meeting attended by the Project Manager, the senior staff or designees, including the WTP QA Manager.	Change does not affect requirement	Change made to clarify assignment of responsibility for this workscope		X
3.3 Responsibilities		<i>Delete “The Design Manager” section.</i> <i>Under “Operations Manager” section, add bullet:</i> • <i>Process technology</i> <i>In “The WTP QA Manager” section, 2nd bullet, delete the second word “for”.</i>	Change does not affect requirement	Change made to clarify responsibility		X
4 Documents and Records 4.2.2 Records		1st - <u>2nd</u> <i>paragraph, deleted last sentence:</i> The transfer of the facility operating records and other documentation shall be described in the Deactivation Plan.	Change does not affect requirement	Align the QAP with the BNI contract scope		X
4.2.3 Storage and Maintenance		<i>1st paragraph, 2nd sentence, revised to read:</i> A Records Inventory and Disposition Schedule system shall be used to set forth and describe mandatory disposition for disposal, or transfer to storage or the client after specified retention periods in the office.	Change does not affect requirement	Align the QAP with the BNI contract scope		X
4.3 Responsibilities		<i>Deleted “The Senior Vice President (TWTID)” section.</i> <i>In “The Business/Project Controls Manager” section, changed “Are” to “Is” in the first line of text.</i>	Change does not affect requirement	Change made to clarify responsibility		X
5 Work Processes 5.2 Requirements		<i>3rd paragraph, 1st bullet, revised to read:</i> • Design procurement, construction, commission, start -up, and operations	Change does not affect requirement	Align the QAP with the BNI contract scope		X

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5.3.7 Sample Control		<i>4th sentence, deleted the words “the Quality Assurance Program Description and”.</i>	Change does not affect requirement	This document reiterated the QAP and QA Provisions documents		X
5.4 Responsibilities		<p><i>Deleted “The Senior Vice President (TWTID)” section.</i></p> <p><i>Deleted “The Design Manager” title, 1st sentence, 1st three bullets, and 6th bullet. Moved 4th, 5th, and 7th bullets below the bulleted section of “The Engineering Manager” section.</i></p> <p><i>Under “The Operations Manager” section, deleted 4th bullet, and added the following bullet to the end of the section:</i></p> <ul style="list-style-type: none"> Is the Chair of the Project Safety Committee <p><i>Add section “The Deputy Project Manager” and following text:</i></p> <p>Is responsible for:</p> <ul style="list-style-type: none"> Ensuring that the WTP is designed, constructed, tested, commissioned, operated, and maintained in a safe, reliable, and efficient manner in accordance with policies and all applicable laws, regulations, authorization bases, and technical requirements Integrating nuclear and industrial safety, quality, and environmental protection into all work Managing the design transition, facility and process design, construction, acceptance testing, and commissioning Integrating the Area Project Managers and functional managers Creating an atmosphere in the workplace where reporting and resolution of conditions adverse to quality is encouraged at all levels Stopping activities within his area of responsibility, which are not accomplished in compliance with applicable authorization bases and/or regulatory requirements Giving full support to the Quality Assurance program described herein, thereby assuring that all work performed under their cognizance will conform to and support the requirements of the Manual <p><i>Delete bullet:</i></p> <ul style="list-style-type: none"> Is the Chair of Project Safety Committee 	<p>Change does not affect requirement</p> <p>Change does not affect requirement</p>	<p>Change made to clarify responsibility</p> <p>Align the QAP with the BNI contract scope</p>		<p>X</p> <p>X</p>
6 Design 6.2.2 Design Process		<p><i>3rd paragraph, 1st sentence, change “design” to “engineering”.</i></p> <p><i>3rd paragraph, 2nd sentence, changed to read:</i></p> <p>These procedures shall be prepared by the engineering organization.</p>	Change does not affect requirement	Change made to clarify responsibility		X

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6.3 Responsibilities		<p><i>Deleted "The Senior Vice President (TWTID)" section.</i></p> <p><i>Deleted "The Design Manager" title, 1st sentence, 3rd, 4th, 6th, and 10th dashes. Moved all other dashes below the bulleted section of "The Engineering Manager" section.</i></p> <p><i>Under 9th dash, delete "leads" and insert "supervisors".</i></p> <ul style="list-style-type: none"> <i>Under "The Area Project Managers" section, delete the 1st, 2nd, 3rd, 4th, 6th, 7th, and 8th bullets.</i> 	Change does not affect requirement	Change made to clarify responsibility		X
7.4 Responsibilities		<i>Deleted "The Senior Vice President (TWTID)" section.</i>	Change does not affect requirement	Clarifies responsibility		X
8 Inspection and Acceptance Testing		<i>2nd paragraph, reference in parentheses at end of the paragraph, revised to read:</i>	Change does not affect requirement	Corrected document reference		X
8.2 Requirements		(DOE-RL-96-0006, Section 4.3.5.1).				
8.2.2.2 Test Procedures		<i>1st paragraph, last sentence, changed "Senior Vice President" to "Engineering Manager".</i>	Change does not affect requirement	Reflects new title		X
9 Management Assessment		<i>Under "The Project Manager" section, 1st bullet, revised to read:</i>	Change does not affect requirement	Clarified qualification of personnel		X
9.4 Responsibilities		<ul style="list-style-type: none"> <i>Planning and completion of an annual review of the overall effectiveness of the management assessments for the entire Project</i> <p><i>Deleted "The Senior Vice President (TWTID)" section.</i></p>				
10 Independent Assessment		<i>Under "The Project Manager" section, 1st bullet, delete the semi-colon after "reports".</i>	Change does not affect requirement	Clarified qualification of personnel		X
10.3 Responsibilities		<i>Deleted "The Senior Vice President (TWTID)" section.</i>				
Appendix A Quality Assurance Program Implementation Matrix		<i>Deleted last two columns in table, titled "Deactivation" and "Project Close-out".</i>	Change does not affect requirement	Align the QAP with the BNI contract scope		X